

**FILED**

SEP 01 2020

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT GREENEVILLEClerk, U. S. District Court  
Eastern District of Tennessee  
At Knoxville

UNITED STATES OF AMERICA )

v. )

LACEY NICOLE PERRY )  
a/k/a Crystal Dawn Dugger )No. 2:20-CR-66JUDGES Corker

FILED UNDER SEAL

**INDICTMENT****COUNTS ONE TO FOUR****(False Use of a Social Security Number, 42 U.S.C. § 408(a)(7)(B))**

The Grand Jury charges that on or about the dates and locations set forth in the table below, within the Eastern District of Tennessee and elsewhere, defendant, LACEY NICOLE PERRY, using the alias of Crystal Dawn Dugger, for the purpose of obtaining something of value from any person as described in the table below and for other purposes, willfully, knowingly, and with the intent to deceive, falsely represented that her Social Security account number was 409-53-xxxx in the written document and record described in the table below, when in fact, as defendant well knew, Social Security account number 409-53-xxxx was not assigned to defendant.

Count	Date	Location	Item of Value	Written Document
One	June 5, 2017	Tennessee Department of Safety and Homeland Security Driver's License Office, 206 Cherokee Park Drive,	Tennessee Driver's License	Application for Tennessee Driver's License

		Suite 3, Elizabethton, TN 37643		
Two	March 18, 2019	Tennessee Department of Safety and Homeland Security Driver's License Office, 4717 Lake Park Drive, Johnson City, TN 37615	Tennessee Driver's License	Application for Tennessee Driver's License
Three	November 14, 2019	A presently unknown location in the Eastern District of Tennessee	Tennessee Driver's License	Tennessee Department of Safety & Homeland Security e- Services online application for duplicate Tennessee Driver's License
Four	January 12, 2020	A presently unknown location in the Eastern District of Tennessee	Tennessee Driver's License	Tennessee Department of Safety & Homeland Security e- Services online application for duplicate Tennessee Driver's License

[42 U.S.C. § 408(a)(7)(B)]

**COUNTS FIVE TO EIGHT**  
**(Aggravated Identity Theft, 18 U.S.C. §§ 1028A(a)(1))**

On or about the dates and at the locations in the Eastern District of Tennessee listed in the table below, LACEY NICOLE PERRY, using the alias of Crystal Dawn Dugger, during and in relation to the felony violation enumerated in the table below did knowingly transfer, possess, and use, without lawful authority, the means of identification of another person, that is, the actual person whose initials are C.D.:

COUNT	DATE	LOCATION	FELONY OFFENSE	MEANS OF IDENTIFICATION
Five	June 5, 2017	Tennessee Department of Safety and Homeland Security Driver's License Office, 206 Cherokee Park Drive, Suite 3, Elizabethton, TN 37643	False Use of a Social Security Number as alleged in Count One, above	The name and date of birth of C.D.
Six	March 18, 2019	Tennessee Department of Safety and Homeland Security Driver's License Office, 4717 Lake Park Drive, Johnson City, TN 37615	False Use of a Social Security Number as alleged in Count Two, above	The name and date of birth of C.D.
Seven	November 14, 2019	A presently unknown location in the Eastern District of Tennessee	False Use of a Social Security Number as alleged in Count Three, above	The name and date of birth of C.D.
Eight	January 12, 2020	A presently unknown	False Use of a Social Security Number as alleged	The name and date of birth of C.D.

		location in the Eastern District of Tennessee	in Count Three, above	
--	--	---	-----------------------	--

[18 U.S.C. § 1028A(a)(1)].

A TRUE BILL:



GRAND JURY FOREPERSON

J. DOUGLAS OVERBEY  
United States Attorney

By:

Mac D. Heavener, III  
Assistant United States Attorney